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June 1, 2023

Honorable Michael B. Kaplan
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Clarkson S. Fisher US Courthouse
402 East State Street
Trenton, NJ 08608

Re: LTL Management LLC - Case No. 23-12825 (MBK)
Order Granting Application to Shorten Time Regarding
Debtor's Motion for Bridge Order Confirming Automatic
Stay Applies to Certain Actions
Our File No.: 24987.003

Dear Judge Kaplan:

I write on behalf of the TCC with regard to the Order entered by Your Honor this morning scheduling a hearing on the Debtor's Motion for a bridge order confirming the automatic stay applies to certain actions (Docket No. 147). The Debtor's Motion was filed at approximately 8:00 p.m. last evening.

Had the TCC been provided with the opportunity, the TCC certainly would have objected to the entry of the Order Shortening Time as the matters raised in the Motion are significant and warrant an opportunity for the parties to prepare and file a written response. As the Court is aware, the preliminary injunction granted by Your Honor runs through June 15, 2023 and the Court has scheduled a hearing on continuation of that injunction on June 13, 2023, when all parties intend to be present in the Court.



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I am aware that Mr. Placitella, who is one of the primary targets of the Debtor's Motion is overseas and will be unavailable for the hearing on Friday. It is hard to imagine any irreparable harm that would befall the Debtor if the Debtor's Motion were heard on June 13th, rather than tomorrow.

Based upon the foregoing, the TCC respectfully requests that the Court vacate its Order Shortening Time and instead list the Debtor's Motion for June 13, 2023. We thank the Court for its consideration of this request.

Respectfully yours,

GENOVA BURNS LLC

DANIEL M. STOLZ

DMS:ms

cc: All counsel of record

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